

Christina N. Goodrich (SBN 261722)
christina.goodrich@klgates.com
Cassidy T. Young (SBN 342891)
cassidy.young@klgates.com
K&L GATES LLP
10100 Santa Monica Boulevard
Eighth Floor
Los Angeles, CA 90067
Telephone: +1 310 552 5000
Facsimile: +1 310 552 5001

*Attorneys for Plaintiff
Entropic Communications, LLC*

**[Additional attorneys listed on
signature page]**

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,
LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC., *et
al.*,

Defendants.

COX COMMUNICATIONS, INC., *et
al.*,

Counter-Claimants,

v.

ENTROPIC COMMUNICATIONS,
LLC; MAXLINEAR
COMMUNICATIONS LLC; AND
MAXLINEAR, INC.,

Counter-Defendants.

Case No. 2:23-cv-1049-JWH-KES
(Lead Case)

Case No. 2:23-cv-1050-JWH-KES
(Related Case)

**STIPULATION RE: HEARING AND
BRIEFING ON MOTIONS TO
DISMISS COX DEFENDANTS'
COUNTERCLAIMS**

District Judge: Hon. John W. Holcomb
Magistrate Judge: Hon. Karen E. Scott

**STIPULATION RE: HEARING AND BRIEFING ON MOTION TO DISMISS
COX DEFENDANTS' COUNTERCLAIMS**

ENTROPIC COMMUNICATIONS,
LLC,

Plaintiff,

v.

COMCAST CORPORATION; *et al.*,

Defendants.

1 Plaintiff and Counter-Defendant Entropic Communications, LLC (“Entropic”);
2 Counter-Defendants MaxLinear, Inc. and MaxLinear Communications, LLC
3 (collectively, “MaxLinear”); and Defendants Cox Communications, Inc., CoxCom
4 LLC, and Cox Communications California, LLC’s (collectively, “Cox”) (together with
5 Entropic and MaxLinear, the “Parties”), by and through their respective counsel,
6 stipulate and enter into this Stipulation re: Hearing and Briefing on Motions to Dismiss
7 Cox Defendants’ Counterclaims:

8 WHEREAS, on October 6, 2023, Cox filed an Amended Answer and
9 Counterclaim (1049 DE 87) against Entropic and Maxlinear;

10 WHEREAS, on December 22, 2023, MaxLinear filed a motion to dismiss Cox’s
11 counterclaims (1049 DE 160);

12 WHEREAS, on December 22, 2023, Entropic also filed a motion to dismiss
13 Cox’s counterclaims (1049 DE 161);

14 WHEREAS, on January 9, 2024, Cox filed its First Amended Counterclaims
15 against Entropic and MaxLinear (1049 DE 189);

16 WHEREAS, Entropic and MaxLinear dispute the procedural propriety of Cox’s
17 amendment of its counterclaims without leave of Court after it had already amended its
18 answer;

19 WHEREAS, the Parties agree that Entropic and MaxLinear’s motions to dismiss
20 Cox’s counterclaims should not proceed and the hearing on the motions to dismiss
21 Cox’s counterclaims filed by Entropic and MaxLinear (1049 DE 160 and 1049 DE 161)
22 should not proceed and should not be adjudicated;

23 WHEREAS, the Parties do not intend to proceed with briefing on these motions,
24 which are set to be heard on February 2, 2024, and instead intend to respond to Cox’s
25 First Amended Counterclaims;

26 WHEREAS, the Parties agree that the February 2, 2024 hearing should be
27 vacated;

1 NOW THEREFORE, the Parties, by and through their respective counsel, hereby
2 STIPULATE AND AGREE as follows:

- 3 1. The hearing set for February 2, 2024 regarding MaxLinear's motion to
4 dismiss (1049 DE 160) and Entropic's motion to dismiss (1049 DE 161) is
5 hereby vacated. These motions shall not proceed.
- 6 2. The deadline for Entropic and MaxLinear to respond to Cox's First
7 Amended Counterclaims (1049 DE 189) shall be **February 6, 2024**.
- 8 3. The deadline for Cox to file its opposition to any motions to dismiss filed
9 by Entropic and MaxLinear in response to Cox's First Amended
10 Counterclaims shall be **March 1, 2024**.
- 11 4. The deadline for Entropic and MaxLinear to file replies in support of any
12 motions to dismiss Cox's First Amended Counterclaims shall be
13 **March 15, 2024**.
- 14 5. Subject to the Court's schedule, any motions to dismiss filed by Entropic
15 and MaxLinear in response to Cox's First Amended Counterclaims will be
16 heard on **March 29, 2024**.

17
18 Dated: January 19, 2024

Respectfully Submitted,

19 By: /s/ Cassidy T. Young

20 Christina N. Goodrich (SBN 261722)

21 Cassidy T. Young (SBN 342891)

K&L GATES LLP

22 10100 Santa Monica Blvd., 8th Fl.

23 Los Angeles, CA 90067

24 Tel.: (310) 552-5547

25 Fax: (310) 552-5001

26 christina.goodrich@klgates.com

27 cassidy.young@klgates.com

28 James Shimota (admitted *pro hac vice*)

K&L GATES LLP

70 W. Madison Street, Suite 3300

Chicago, IL 60602
Tel.: (312) 372-1121
Fax: (312) 827-8000
jim.shimota@klgates.com

Nicholas F. Lenning (*pro hac vice*)
K&L GATES LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
(206) 623-7580
(206) 370-6006 (fax)
nicholas.lenning@klgates.com

Peter Soskin (SBN 280347)
K&L GATES LLP
4 Embarcadero Center, Suite 1200
San Francisco, CA 94111
Tel.: (415) 882-8200
Fax: (415) 882-8220
peter.soskin@klgates.com

**ATTORNEYS FOR PLAINTIFF
ENTROPIC COMMUNICATIONS, LLC**

Dated: January 19, 2024

By: /s/ Rose S. Lee
Bita Rahebi (CA SBN 209351)
brahebi@mofo.com
Alex S. Yap (CA SBN 241400)
ayap@mofo.com
Rose S. Lee (CA SBN 294658)
roselee@mofo.com
MORRISON & FOERSTER LLP
707 Wilshire Boulevard, Suite 6000
Los Angeles, California 90017-3543
Telephone: (213) 892-5200
Facsimile: (213) 892-5454

Richard S.J. Hung (CA SBN 197425)
rhung@mofo.com
MORRISON & FOERSTER LLP
425 Market Street

San Francisco, California 94105-2482
Telephone: (415) 268-7000
Facsimile: (415) 268-7522

**ATTORNEYS FOR COUNTER-
DEFENDANTS MAXLINEAR, INC.
AND MAXLINEAR
COMMUNICATIONS LLC**

Dated: January 19, 2024

By: /s/ April E. Isaacson

April E. Isaacson (SBN 180638)
aisaacson@kilpatricktownsend.com
Two Embarcadero Center
Suite 1900
San Francisco CA 94111
(415) 273 8306

Rishi Gupta (SBN 313079)
rgupta@kilpatricktownsend.com
Sarah Y. Kamran (SBN 347617)
skamran@kilpatricktownsend.com
1801 Century Park East
Suite 2300
Los Angeles CA 90067
(310) 777 3733

Mitchell G. Stockwell (pro hac vice)
mstockwell@kilpatricktownsend.com
Vaibhav P. Kadaba (pro hac vice)
wkadaba@kilpatricktownsend.com
Michael J. Turton (pro hac vice)
mturton@kilpatricktownsend.com
Courtney S. Dabbieri (pro hac vice)
cdabbieri@kilpatricktownsend.com
Christopher S. Leah (pro hac vice)
cleah@kilpatricktownsend.com
Andrew N. Saul (pro hac vice)
asaul@kilpatricktownsend.com
1100 Peachtree Street, NE
Suite 2800

Atlanta GA 30309
(404) 815 6500

**ATTORNEYS FOR DEFENDANTS COX
COMMUNICATIONS, INC., COXCOM,
LLC, AND COX COMMUNICATIONS
CALIFORNIA, LLC**

SIGNATURE CERTIFICATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Cassidy T. Young, attest that all other signatories listed above concur in this filing's content and have authorized the filing.

/s/ Cassidy T. Young